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*Of Attorneys for Defendant
Health Net Health Plan of Oregon, Inc.*

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF OREGON

PORTLAND DIVISION

DWAYNE BRANDON,

Plaintiff,

v.

**HEALTH NET HEALTH PLAN OF
OREGON, INC,**

Defendant.

No. 3:19-cv-00356-AC

**DECLARATION OF JEFFREY D. HERN
IN SUPPORT OF DEFENDANT'S
UNOPPOSED MOTION TO STAY OR
EXTEND CASE DEADLINES DUE TO
PENDING SETTLEMENT**

I, Jeffrey Hern, hereby declare that:

1. I am one of the attorneys for Defendant Health Net Health Plan of Oregon, Inc. I make this declaration in support of Defendant's Motion to Stay or Extend Case Deadlines Due to Pending Settlement, filed concurrently herewith.

2. I conferred with Plaintiff's counsel by telephone on November 12, 2019, and Plaintiff does not oppose this motion.

3. The parties reached substantial agreement about a settlement in this case per LR 41-1(a) via phone and email conferral between counsel on November 11, 2019.

4. I anticipate that the parties will consummate a final settlement within fourteen days or less.

I HEREBY DECLARE THAT THE ABOVE STATEMENT IS TRUE TO THE BEST OF MY KNOWLEDGE AND BELIEF, AND THAT I UNDERSTAND IT IS MADE FOR USE AS EVIDENCE IN COURT AND IS SUBJECT TO PENALTY FOR PERJURY.

Dated this 12th day of November, 2019.

SCHWABE, WILLIAMSON & WYATT, P.C.

By: s/ Jeffrey D. Hern
Jeffrey D. Hern, OSB #043138
Of Attorneys for Defendant
Health Net Health Plan of Oregon, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on the 12th day of November, 2019, I caused to be served the foregoing **DECLARATION OF JEFFREY D. HERN IN SUPPORT OF DEFENDANT'S UNOPPOSED MOTION TO STAY OR EXTEND CASE DEADLINES DUE TO PENDING SETTLEMENT** on the following party at the following address:

Jeremy L. Bordelon
Evergreen Disability Law
465 NE 181st Avenue, Suite 500
Portland, OR 97230
Phone: 503-888-9331
Fax: 503-836-1870
Email: jeremy@evergreendisability.com

<input type="checkbox"/>	Hand Delivery
<input type="checkbox"/>	Facsimile
<input type="checkbox"/>	U.S. Mail
<input type="checkbox"/>	Overnight Courier
<input type="checkbox"/>	E-mail
<input checked="" type="checkbox"/>	ECF Filing

Of Attorneys for Plaintiff

s/ Jeffrey D. Hern

Jeffrey D. Hern, OSB #043138